

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 12 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
THOMAS C. WRIGHT, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Thomas C. Wright for Ethicon Wave 1, Dkt. 1986 (motion), Dkt. 1988 (memorandum in support) and the reply brief filed for Ethicon Wave 4, Dkt. 3844 (reply). Plaintiffs respectfully request that the Court exclude Thomas C. Wright's testimony, for the reasons expressed in the Wave 1 and 4 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019

Respectfully submitted,

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**EXHIBIT A**

Blake, Wendy	2:17-cv-01896
Bond, Cathy Lynn	2:13-cv-10501
Brown, Wanda	2:13-cv-11267
Burger, Frances D.	2:13-cv-20907
Carver, Donna	2:12-cv-04164
Chrysler, Marion	2:12-cv-02060
Clowe, Paula Carole	2:12-cv-06893
Coleman, Deborah J.	2:13-cv-13630
Doddato, Samantha D.	2:17-cv-01897
Duncan, Michelle R.	2:17-cv-01898
Ekici, Gulfinaz	2:17-cv-01948
Francis, Nancy S.	2:17-cv-01949
Gale, Sharon B.	2:17-cv-01951
Granda, Jennifer L.	2:17-cv-01952
Graves, Tina	2:12-cv-07177
Hicks, Susan	2:17-cv-01971
Hines, Cynthia D.	2:13-cv-04832
Hughes, Sherri	2:13-cv-20904
Hunt, Angela L.	2:17-cv-01956
Lawler, Mary L.	2:14-cv-19721
Leavitt, Jacinta	2:14-cv-01655
Luckett-Epps, Seba	2:13-cv-04870
Luna, Patricia	2:17-cv-01809
McGathey, Elizabeth	2:12-cv-01538
Miller, Laura Lynn	2:13-cv-23376
Modesitt, Pauletta	2:17-cv-01612
Norris, Doreta S.	2:13-cv-11269
Nugnes, Darleen	2:14-cv-24207
Pearson, Phyllis	2:13-cv-03168
Penn, Teresa	2:17-cv-01818
Phillips, Patricia	2:17-cv-01893
Rodriguez, Judy	2:15-cv-09979
Rothemberger, Leiann	2:17-cv-01625
Ruberti, Debra	2:13-cv-01463
Shea-Towers, Deborah	2:13-cv-01540

Stimers, Dayna	2:15-cv-00659
Tucker, Brenda	2:13-cv-16593

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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